

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

Wilfredo Torres

---

Write the full name of each plaintiff.

CV

(Include case number if one has been assigned)

-against-

**COMPLAINT**

Do you want a jury trial?

Yes  No

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U.S. Department Justice

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Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

**NOTICE**

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- Federal Question**
- Diversity of Citizenship**

### A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

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**Freedom of Information Act (FOIA)**

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### B. If you checked Diversity of Citizenship

#### 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, \_\_\_\_\_, is a citizen of the State of  
(Plaintiff's name)

---

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of \_\_\_\_\_.

---

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, \_\_\_\_\_, is a citizen of the State of  
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of \_\_\_\_\_.

If the defendant is a corporation:

The defendant, \_\_\_\_\_, is incorporated under the laws of  
the State of \_\_\_\_\_

and has its principal place of business in the State of \_\_\_\_\_

or is incorporated under the laws of (foreign state) \_\_\_\_\_

and has its principal place of business in \_\_\_\_\_.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

**Wilfredo Torres**

First Name	Middle Initial	Last Name
470 Second Avenue Apt. 2A		
Street Address		
New York, N.Y. 10016		
County, City	State	Zip Code
212-447-1737		
Telephone Number	Email Address (if available)	

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

First Name	Last Name	
U.S. Department of Justice		
Current Job Title (or other identifying information)		
Current Work Address (or other address where defendant may be served)		
950 Pennsylvania Avenue, NW Washington, D.C. 20530		
County, City	State	Zip Code

Defendant 2:

First Name	Last Name	
Current Job Title (or other identifying information)		
Current Work Address (or other address where defendant may be served)		
County, City	State	Zip Code

Defendant 3:

First Name	Last Name	
Current Job Title (or other identifying information)		
Current Work Address (or other address where defendant may be served)		
County, City	State	Zip Code

**Defendant 4:**

First Name	Last Name	
<hr/>		
Current Job Title (or other identifying information)		
<hr/>		
Current Work Address (or other address where defendant may be served)		
<hr/>		
County, City	State	Zip Code

### III. STATEMENT OF CLAIM

Place(s) of occurrence: See attached writing titled "Facts".

Date(s) of occurrence: From 9-28-2015 to Present

## FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

See attached writing titled "Facts".

## **INJURIES:**

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

See attached writing titled "Facts".

#### IV. RELIEF

State briefly what money damages or other relief you want the court to order.

See attached writing titled "Facts".

## V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

Dated	<u>10-12-2021</u>		
Plaintiff's Signature			
First Name	Middle Initial	Last Name	
<u>Wilfredo Torres</u>			
Street Address	<u>470 Second Avenue 2A</u>		
County, City	State	Zip Code	
<u>New York N.Y.</u>		<u>10016</u>	
Telephone Number			
<u>212 447 1737</u>			
Email Address (if available)			

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

Yes  No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

**Facts:**

1---Serving the Deep State, U.S. Senate Select Committee on Intelligence members Charles Schumer, and Kirsten Gillibrand, appointed Ronnie Abrams as U.S. Judge at the Southern District of New York, and her husband Greg Andres, as Deputy U.S. Attorney General and later as assistant to Special Counsel Robert Mueller.

2---Robert Mueller is the infamous former FBI Director who **five (5) days before 9/11** was named to that position by then U.S. President George W. Bush with the sole mission to cover-up the Deep State-CIA bombing and destruction of the twin towers.

3---On 11-07-2018 the U.S. Attorney for the SDNY tried to investigate 9/11, and was quickly fired. Exh.1

4---In my present lawsuit 16CV2362 about a CIA warrantless raid of my apartment Judge Abrams persecutes me, Andres orders additional warrantless raids, and Judge Abrams covers them up. Exhibit 2.

5---I am erroneously included in the terrorists list of the United States government, and as such am persecuted, tortured, and denied due process of law by the Courts. Exhibit 3.

6---The government of the United States publicly accepts that its own Central Intelligence Agency ("the CIA terrorists") as enforcers of the Deep State bombed and destroyed the World Trade Center on September 11, 2001 ("9-11"); slaughtered over 3,000 people almost at front of the federal courthouse; blamed others; massacred over 1-million innocent men, women and

-2-

children in Iraq; got both political parties to assign billions of dollars to the fake "war on terror" at home and abroad; multiplied the military budget; activated a tyrannical law called The Patriot Act; a secret and omnipotent Court named Foreign Intelligence Surveillance Court; and replaced the U.S. Constitution for a police-state. Exhibits 4,5,6,7.

7--As part of the CIA's COINTELPRO domestic assassinations program, on 9-28-2015 agents of that agency accompanied by my landlord, Bellevue South Associates ("BSA"), carried-out a warrantless raid of my apartment after breaking its door.

8---They left a handwritten note with the word "intel", and the name of New York Regional Director of the Department of Homeland Security, Dennis McGowan, as the person that sent them.

9---They called the raid a "wellness-check".

10---NYPD and federal officials ignored my complaints, and days later planted a surveillance tower at front of my window and ignored other requests to investigate. Exhibits 8, and 9.

11---I filed lawsuit 16CV2362 at the Southern District of New York federal Court, and it was assigned to Judge Ronnie Abrams, and Magistrate-Judge Kevin Nathaniel Fox who always protected the government agents while treating me like a criminal.

12---Invited by Judges Abrams. and Fox, the CIA agents and BSA returned on 4-28-2016, broke the door of my apartment for another warrantless raid, handcuffed, abducted, and took me by ambulance to HHC Bellevue Hospital to be tortured as a John Doe. Exhibit 10.

-3-

13---They called the raid "a wellness-check".

14---Judges Abrams and Fox refused to name the CIA-FBI terrorists as defendants despite ample evidence. Case 16CV2362-dockets 47, 66, 84, 89, 105, 106, 108, 119, 120, 121, 127, 128, 129, 132, 152, 158, 162, 250, 259, 260, 261, 263, 264, 265, 267, 316, 342, 444, 435, 446.

15---In so doing Judges Abrams and Fox were inviting more attacks against me.

16---The NYPD filed an affidavit stating that the CIA agents, not the NYPD, were responsible for handcuffing, kidnapping, transporting, and torturing me at HHC Bellevue Hospital. Case 16CV2362, docket 210.

17---The FDNY ambulance report states "A MALE ADULT COMPLAINING OF NOTHING". Case 16CV2362, docket 212.

18---During the torture I was assaulted by HHC Bellevue Hospital employees, forcefully injected with drugs, urine and blood were forcefully taken, and x-rays and MRI's were done.

19---The torture was such that I developed fever of 101 degrees, my two-days old spinal surgery was permanently damaged, and up to this day need medications, treatment, and suffer from PTSD.

20---New case 18CV4665 against HHC Bellevue Hospital was commenced without the CIA defendants.

21---Although she was biased against me, and her husband Greg Andres was Deputy U.S. Attorney General, Abrams denied my petition for her recusal. Case 16CV2362, docket 333.

-4-

22---Invited by Judges Abrams and Fox, on 12-13-2018 a CIA agent posing as NYPD Lieutenant Neil Veras, and NYPD Police Officer Patricia de Jesus, used a sledgehammer trying to break the door of my apartment after I refused to give them access. Video-recorded.

23---On 12-20-2018 Veras, de Jesus, and Detective Christopher Rickford unsuccessfully demanded access to my apartment, and yelled threats such as "we will tell your neighbors that you are a rapist, and a pedophile". Recorded.

24---On 12-21-2018 a community lawyer told me that Veras and de Jesus wanted to arrest me, I surrendered at the 13th police station, was falsely charged with a misdemeanor, taken before a Judge, released without bail, and the case was dismissed days later.

**25---Days after I asked Judge Abrams to recuse herself of case 16CV2362 (docket 333)**  
on 2-27-2019 she and her husband, Greg Andres, retaliated by sending Veras, de Jesus, and three (3) NYPD policemen for another warrantless raid of my apartment and falsely charged me with a misdemeanor to justify their crime.

26---Veras ordered the three (3) Police Officers to take me to the 13th police station while he and de Jesus stayed behind ransacking the apartment in my absence. Exhibit 2.

27---I was taken to the police station; with leg shackles to HHC Bellevue Hospital for another involuntary psychiatric exam; to the police station; to Court; to the police station; to HHC Bellevue Hospital; to the police station; and to Court where handcuffed behind my back a Judge released me more than a day later; the case was dismissed days later.

-5-

28---Although the case was related to the previous raids, to escape the persecution by Judges Abrams and Fox, I was forced to ask Chief Judge Colleen McMahon to assign it to a different courtroom: new case 19CV6332 was commenced.

29---On 4-26-2021 and 5-17-2021 I filed individual complaints of corruption against Judges Abrams and Fox, but the Chief Judge of the Court of Appeals for the Second Circuit, Debra Ann Livingston, refused to investigate them "because they exceed five (5) pages".

30---More yet, conspiring with the CIA-FBI terrorists that perpetrated the warrantless raid of 2-27-2019, and to protect Judges Abrams and Fox, and Andres, the Judges presiding over new case 19CV6332, Edgardo Ramos and Katharine Parker, abusively stayed it **for 15-months**.

**My Freedom of Information Act ("FOIA") Request at the U.S. Department of Justice ("DOJ"):**

On 4-06-2021 I filed at DOJ Freedom of Information Act request EMRUFOIA 040621 asking:

---"copies of all communications, telephone records, electronic communications, audio recordings, and all records of contacts between the U.S. Department of Justice and the court or with any other person or agency such as the U.S. Attorney's Office of the Southern District of New York, the New York City Police Department or the City of New York-Law Department about cases SDNY 16CV2362 and 19CV6332".

---"the relation to DOJ by the man that appears in a photograph identified as NYPD Lt. Neil Veras as perpetrator of the 2-27-2019 warrantless raid". Exhibit 2.

---"any and all activities between the office of Special Counsel Robert Mueller and his assistant Greg Andres, to these lawsuits".

Because DOJ failed to produce the requested documents, on 8-06-2021 I filed appeal EMRUFOIA 040621-18, but up to this day the agency has not released the requested data.

-6-

**Relief Requested:**

A court order to the U.S. Department of Justice for the release of the documents described above, and for any other relief that this court finds just.

*Wilfredo Torres*  
Wilfredo Torres  
470 Second Avenue Apt. 2A  
New York, N.Y. 10016

Telephone: 212-447-1737

Dated: October 12, 2021

(1)

NEWS (/NEWS)

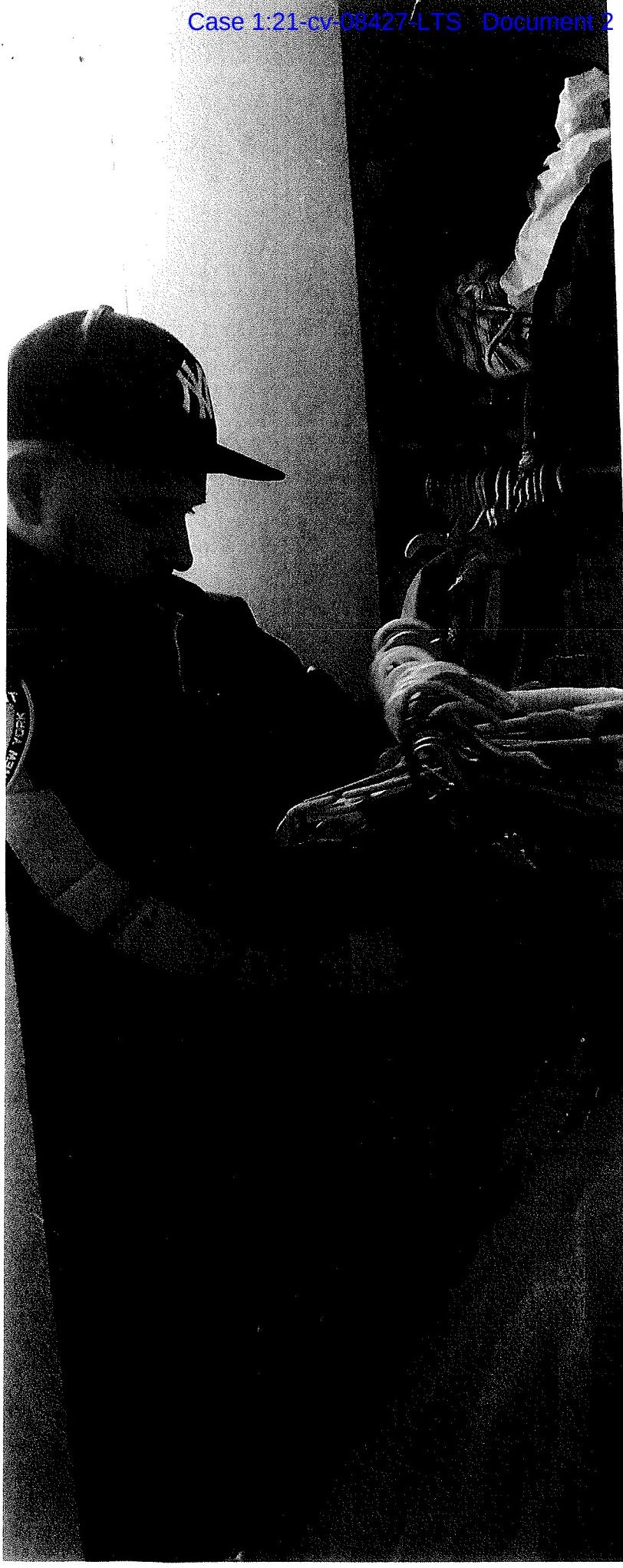
# Update: U.S. Attorney Berman Agrees To Step Down

BY DAVID CRUZ [/STAFF/DAVID-CRUZ]

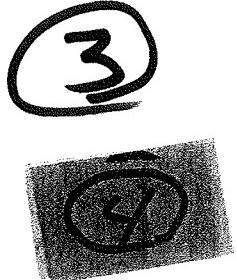
JUNE 20, 2020 9:54 A.M. • 60 COMMENTS



Geoffrey Berman. FRANK FRANKLIN II/AP/SHUTTERSTOCK



DANIEL L. MEYERS  
ATTORNEY-AT-LAW  
350 BROADWAY, SUITE 308  
NEW YORK, NY 10013  
(212) 226-4106 (PHONE)  
(212) 431-0107 (FAX)



May 23, 2006

Central Intelligence Agency  
Information and Privacy Coordinator  
Washington, D.C. 20505

**Re: Freedom of Information Act Request  
On behalf of Mr. Wilfredo Torres**

Dear Information and Privacy Coordinator:

Your undersigned is the attorney for Mr. Wilfredo Torres, who has, in writing, authorized me to request on his behalf certain records and information from your agency as more fully described below. (Attached is the duly notarized authorization).

This letter constitutes a request pursuant to the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA"), and the Privacy Act, 5 U.S.C. § 552a ("PA"). Similar requests have been submitted to the Transportation Security Organization ("TSA"), the Department of Justice ("DOJ"), the Department of Homeland Security ("DHS"), the Federal Bureau of Investigation ("FBI") and the National Security Agency ("NSA").

The following personal information is submitted to specifically identify the party in interest:

- Mr. Wilfredo Torres;
- 470 Second Avenue, Apt. 2A  
New York, NY 10016;
- Date of birth, March 23, 1952;
- Place of birth, San Juan, Puerto Rico;
- Social Security number, 584-42-7541.

For many years, including 2006, Mr. Torres travels frequently between New York and Puerto Rico. His principle travel purpose is to visit with family. He has been designated wrongfully, by your agency and/or in concert with other governmental agencies and/or the airlines, as a person who poses or is suspected of posing "a threat to civil aviation." As a

From the "Daily Times" of April



Press TV is targeted

4

**'It was not Iraq. It were other people', says Trump**

Home / US / Politics

Mon Jun 17, 2019 03:25PM [Updated: Mon Jun 17, 2019 05:57PM]



US President Donald Trump talked to ABC News' George Stephanopoulos on Sunday.

US President Donald Trump says he knows who was behind the September 11, 2001 terrorist attacks that left thousands of Americans dead.

In an exclusive interview with ABC News' George Stephanopoulos broadcast on Sunday, Trump categorically said that "Iraq did not knock down the World Trade Center."



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5

## "US Terrorism List Violates US Civil Liberties"

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### Poll

Is the war against Syria's government freedom-seeking battle, or a terrorist one?

- 1) It is a battle waged by freedom-seeking forces.
- 2) It is a battle waged by foreign-backed terrorists.

0

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Caleb Maupin, Press TV, New York



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### Fact Corner

The US has been accused of using its power to control and harass political activists, journalists, and by implication, anyone subject to US surveillance programs. The American Civil Liberties Union (ACLU) has filed a class action suit against the FBI, claiming they violated

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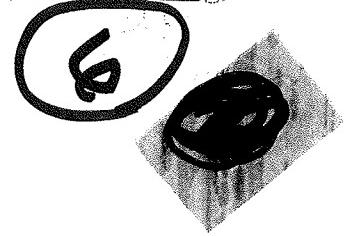
The Federal Bureau of Investigation, the national policing agency of the United States, admits to having compiled a "Terrorist Screening Database" with the names of persons suspected or alleged to be involved in terrorism.

The list contains the names of over a million people, who have been convicted of no crime and given no chance to defend themselves.: One activity of the "Terrorism Screening Database" is the creation of the "No Fly List", which prevents thousands of people, including many US citizens, from boarding any aircraft. Once added to the list, things in their lives can become very difficult. Wilfredo Torres, suddenly found himself being subject to all kinds of harassment after he began protesting discrimination in travel policies. In one instance he was removed from a flight by airline officials. When Mr. Torres lawyer filed a request for information, the FBI revealed that it had collected over 100 pages of information about him. He now wants to have his name removed from the list. The FBI and other divisions of the US Department of Justice, have a long history of suppressing political dissidents over the last several decades. A law suit has been filed by the American Civil Liberties Union, in the hopes that courts will intervene, and halt the continued use of such lists.

### Related Stories:

[UN to evacuate MKO terrorists from Iraq](#)

[Support for Canada-US National Security Cooperation declines](#)

Published on *American Civil Liberties Union* (<https://www.aclu.org>)

## Terror Watch List Counter: A Million Plus [1]

### **Why are there so many names on the U.S. government's terrorist list?**

In September 2007, the Inspector General of the Justice Department reported [2] that the Terrorist Screening Center (the FBI-administered organization that consolidates terrorist watch list information in the United States) had over 700,000 names in its database as of April 2007 - and that the list was growing by an average of over 20,000 records per month.<sup>1</sup> (See also this new March 2008 report [3].<sup>2</sup>)

By those numbers, the list now has over one million names on it. Terrorist watch lists must be tightly focused on true terrorists who pose a genuine threat. Bloated lists are bad because

- they ensnare many innocent travelers as suspected terrorists, and
- because they waste screeners' time and divert their energies [4] from looking for true terrorists.

Watch list main page [5]

Airline security page [6]

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**Source URL:** <https://www.aclu.org/other/terror-watch-list-counter-million-plus#comment-0>

### **Links**

[1] <https://www.aclu.org/other/terror-watch-list-counter-million-plus>

[2] <http://www.usdoj.gov/oig/reports/FBI/a0741/final.pdf>

[3] <http://www.usdoj.gov/oig/reports/plus/a0816/final.pdf>

[4] <https://www.aclu.org/privacy/gen/26535res20060824.html>

[5] <https://www.aclu.org/technology-and-liberty/watch-lists>

[6] <https://www.aclu.org/technology-and-liberty/airline-security>



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

(7)

November 7, 2018

BY MAIL

Mick G. Harrison, Esq.  
Executive Director  
The Lawyers' Committee  
for 9/11 Inquiry, Inc.  
426 River Mill Road  
Jersey Shore, Pennsylvania 17740

Dear Mr. Harrison:

We have received and reviewed The Lawyers' Committee for 9/11 Inquiry, Inc.'s submissions of April 10 and July 30, 2018. We will comply with the provisions of 18 U.S.C. § 3332 as they relate to your submissions.

Very truly yours,

GEOFFREY S. BERMAN  
United States Attorney

By:

  
Michael Ferrara  
Ilan Graff  
Chiefs, Terrorism and  
International Narcotics Unit



**U.S. Department of Justice**  
Office of the Inspector General  
*Investigations Division*  
1425 New York Avenue, N.W., Suite 7100  
Washington, D.C. 20530

(8)

June 26, 2018

Wilfredo Torres  
470 Second Avenue  
Apartment 2A  
New York, NY 10016

Dear Dr. Torres:

Thank you for your correspondence dated June 15, 2018. The U.S. Department of Justice (DOJ), Office of the Inspector General, investigates allegations of misconduct by employees and contractors of DOJ, as well as waste, fraud and abuse affecting DOJ programs or operations.

We have thoroughly reviewed the material and concluded that the issues raised do not warrant an investigation by our Office. Accordingly, we will take no further action regarding your correspondence and consider the matter closed.

Of course, if you have new information that involves other allegations or issues regarding DOJ employees, contractors, programs or operations, please feel free to submit that information to us.

Thank you for giving us the opportunity to review your concerns.

Sincerely,

Office of the Inspector General  
Investigations Division



# Unknown-M,Dogwood, 54 y/o M, DOB 1/1/62

MRN 3727225, visit 3727225-1

Bellevue Hospital Center, medicine

Discharge Instruction Sheet

4/29/16 13:55

10

Last edit by White,LeRoy, RN on 4/29/16 14:00, complete.  
(Patient Instructions)

**IMPORTANT: Please bring this form to your first appointment with your doctor.**

**Physician Discharge Instructions by An,Nicholas, MD (Attending Hwang,John, MD) as of 4/29/16 01:29pm**

Discharge Date: 4/29/16

## **Diagnoses:**

The principle reason(s) for your hospitalization were: Delirium

## **Activity and Diet:**

Home Care Ordered: no home care required

Activity: as tolerated

Home Diet: Regular

## **Your Medications Are:**

## **Home Medication List**

## **Discharge Medications**

## **Smoking Status and Additional Information:**

You are not a smoker.

Discharge Equipment Required: none.

**No follow-up appointments necessary**